

September 15, 2021

VIA CM/ECF

Honorable Brantley Starr
U.S. District Court for the
Northern District of Texas
1100 Commerce Street, Room 1528
Dallas, TX 75242

**Re: *In re Fluor Corporation Stockholder Derivative Litigation,*
Lead Case No. 3:20-cv-01442-X**

Dear Judge Starr:

We write on behalf of all parties in the above-captioned action (the “Derivative Action”) to respectfully request a docket order staying all deadlines in the Derivative Action until November 29, 2021, to accommodate the parties’ efforts at a potential resolution.

Your Honor recently ordered the parties to meet and confer regarding both a proposed scheduling and discovery order and potential settlement. *See Order of August 6, 2021* (Dkt. No. 35). That Order set a deadline of September 29, 2021, for the parties to submit their proposal.

The parties have conferred and believe that a private mediation would be productive at this juncture. Indeed, a private mediation is already scheduled for September 30, 2021, in the related securities class action pending before this Court, *Chun v. Fluor Corp. et al.*, No. 3:18-cv-01338-X. It is anticipated that mediation of the Derivative Action, and certain other similar stockholder derivative actions, will also begin on or soon after September 30, 2021.

Given the foregoing, the parties respectfully request that the Court enter a docket order staying all deadlines in the above-captioned matter until November 29, 2021, at which point the parties will provide the Court with an update as to their settlement efforts.

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Respectfully submitted,

ROBBINS LLP

/s/ Shane P. Sanders
Shane P. Sanders
Co-Lead Counsel
Attorneys for Co-Lead Plaintiff Jay Lee

**GIBSON DUNN &
CRUTCHER LLP**

/s/ Michael L. Raiff
Michael L. Raiff
Counsel for Defendants

**SCOTT + SCOTT
ATTORNEYS AT LAW LLP**

/s/ Scott R. Jacobsen
Scott R. Jacobsen
Co-Lead Counsel
Attorneys for Co-Lead Plaintiff Joan Goodman